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10
11 UNITED STATES DISTRICT COURT
12 NORTHERN DISTRICT OF CALIFORNIA
13 SAN JOSE DIVISION

14 UNITED STATES OF AMERICA,) No. CR 15-00264 LHK/HRL
15 Plaintiff,) STIPULATION AND [PROPOSED] ORDER
16 v.) EXCLUDING TIME UNDER THE SPEEDY TRIAL
ACT
17 JOSEPH SHAYOTA,) SAN JOSE VENUE
ADRIANA SHAYOTA,)
JUSTIN SHAYOTA,)
WALID JAMIL, a/k/a Wally Jamil,)
RAID JAMIL, a/k/a Brian Jamil,)
KEVIN ATTIQ)
FADI ATTIQ, a/k/a Fred Attiq,)
LESLIE ROMAN,)
MARIO RAMIREZ, and)
CAMILO RAMIREZ,)
Defendants.)

23
24 On July 9, 2015, the undersigned parties appeared before the Court for an initial appearance in
25 the above-captioned matter. Each defendant, through his or her counsel, entered a not guilty plea and
26 agreed to an exclusion of time under the Speedy Trial Act from July 9, 2015 through August 5, 2015.
27 The parties agree and stipulate that an exclusion of time is appropriate based on the defendant's need for
28 effective preparation of counsel. 18 U.S.C. § 3161(h)(7)(B)(iv). Specifically, the government is

1 preparing a voluminous amount of discovery and anticipates on making it available to the defendants
2 through a third party vendor before the next court appearance on August 5, 2015.

3 SO STIPULATED:

4 DATED: July 13, 2015

MELINDA HAAG
United States Attorney

5 _____
6 /s/
7 MATTHEW A. PARRELLA
SUSAN KNIGHT
Assistant United States Attorneys

8 DATED: July 13, 2015

9 _____
10 /s/
11 GREGORY A. VEGA
Counsel for Joseph Shayota

12 DATED: July 13, 2015

13 _____
14 /s/
15 JOSEPH M. McMULLEN
Counsel for Adriana Shayota

16 DATED: July 13, 2015

17 _____
18 /s/
19 GINNY H. K. WALIA
Counsel for Justin Shayota

20 DATED: July 13, 2015

21 _____
22 /s/
23 JAMES T. REILLY
Counsel for Walid Jamil

24 DATED: July 13, 2015

25 _____
26 /s/
27 DAVID R. KNUTSEN
Counsel for Raid Jamil

28 DATED: July 13, 2015

29 _____
30 /s/
31 THOMAS J. WARWICK, JR.
Counsel for Kevin Attia

1 DATED: July 13, 2015

2 /s/

3 THOMAS J. WARWICK, JR.
Counsel for Fadi Attia

4 DATED: July 13, 2015

5 /s/

6 ROBERT CARLIN
7 Assistant Federal Public Defender
Counsel for Leslie Roman

8 DATED: July 13, 2015

9 /s/

10 KNUT JOHNSON
Counsel for Mario Ramirez

11 DATED: July 13, 2015

12 /s/

JUDY CLARKE
Counsel for Camilo Ramirez

16 **ORDER**

17 Accordingly, for good cause shown, the Court HEREBY ORDERS that time be excluded
18 under the Speedy Trial Act from July 9, 2015 through August 5, 2015. The Court finds, based on the
19 aforementioned reasons, that the ends of justice served by granting the requested continuance outweigh
20 the best interest of the public and the defendant in a speedy trial. The failure to grant the requested
21 continuance would deny defense counsel reasonable time necessary for effective preparation, taking into
22 account the exercise of due diligence, and would result in a miscarriage of justice. The Court therefore
23 concludes that this exclusion of time should be made under 18 U.S.C. §§ 3161(h)(7)(A) and (B)(iv).

24 SO ORDERED.

25 DATED:

26 7/14/15

27 HON. HOWARD R. LLOYD
United States Magistrate Judge